

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SAFER TUG & BARGE LLC,

Plaintiff,

Case No.: 19-cv-06820

-against-

COMPLAINT

RVM MARINE CONTRACTING, INC.,

Defendants.

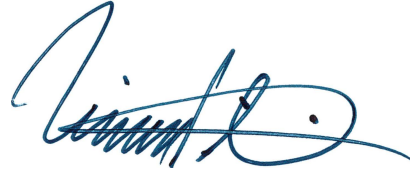
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Plaintiff, SAFER TUG & BARGE LLC (“STB”), for its complaint against the defendant, alleges as follows:

1. This is an admiralty and maritime claim within the meaning of Rule 9(h).
2. This Court has jurisdiction over STB’s claims against the defendant pursuant to 28 U.S.C. §1333.
3. Venue is proper in this Court pursuant to 28 U.S.C. §1391(b).
4. At all times material to this action, STB was the owner of a barge and related equipment (the “Barge”).
5. On or about April 26, 2018, defendant chartered the Barge from STB for \$4,000.00 per month.
6. The charter party was initially for one month.
7. Defendant took possession of the Barge in April 2018.
8. Defendant retained use and possession of the Barge to November 27, 2018.
9. Defendant paid charter hire for the Barge for the months of April 26-May 25, 2018 and May 26-June 25, 2018.
10. Defendant failed to pay charter hire for the Barge after June 25, 2018.
11. Defendant owes STB, \$20,000.00, plus interest, costs and disbursements.

WHEREFORE, plaintiff demands judgment against the defendant in the amount of \$20,000.00 together with interest, costs, disbursements, attorneys' fees and such other, further, and different relief as may be just, proper, and equitable.

Dated: December 4, 2019
Mineola, New York

A handwritten signature in blue ink, appearing to read 'Giuliano', with a stylized flourish at the end.

Nicholas P. Giuliano, Esq.
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